

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

Numbering Resource Optimization	)	
	)	CC Docket No. 99-200
	)	

**PETITION OF CENTENNIAL COMMUNICATIONS CORP.  
FOR TEMPORARY WAIVER OF DEADLINE IN 47 C.F.R. § 52.15(f)(6)**

Centennial Communications Corp. (“Centennial”), by its counsel and pursuant to Section 1.3 of the Commission’s Rules,<sup>1</sup> hereby petitions the Commission for a temporary waiver or extension of the upcoming February 1, 2002 deadline for submitting one of its FCC Form 502 - Numbering Resource Utilization/Forecasting (“NRUF”) Reports, as required by Section 52.15(f)(6) of the Commission’s Rules.<sup>2</sup> As discussed below, Centennial is experiencing unusual technical difficulties in compiling accurate numbering data for one of its OCNs, rendering it impossible for Centennial to retrieve and correctly categorize its numbering data for OCN 6629 by February 1, 2002. Accordingly, Centennial respectfully requests that the Commission temporarily waive this deadline, for two weeks, and permit Centennial to file the forecasting and utilization report for this OCN by February 15, 2002.

Section 52.15(f)(6) requires that “[r]eporting carriers shall file forecast and utilization reports semi-annually on or before February 1 for the preceding reporting period ending on

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<sup>1</sup> 47 C.F.R. § 1.3.

<sup>2</sup> Through its various subsidiaries and operating companies, Centennial presently provides mobile wireless communications services in 31 cellular markets domestically, and mobile wireless communications and competitive local exchange services in Puerto Rico/the Caribbean. Centennial has already filed its February 2002 Form 502 covering its Puerto Rico operations, and the Form 502 for its other domestic OCN – OCN 6541 . Consequently, this temporary waiver/extension request applies only to one of the two Form 502s that Centennial is required to file for its domestic operations – specifically, an extension is requested for the NRUF Report for Operating Company Number (“OCN”) 6629.

December 31, and on or before August 1 for the preceding reporting period ending on June 30.”

These NRUF reports require that carriers provide detailed information on six categories of number utilization: Assigned, Intermediate, Reserved, Aging, Administrative, and Available numbers. Mandatory reporting began on September 15, 2000 after the Commission extended the August 1 deadline for all carriers based on various petitions and requests for extensions of time.<sup>3</sup>

Centennial recently determined that it will be unable to complete the NRUF report for OCN 6629 by the February 1 due date. Centennial has not yet purchased and installed software to enable it to retrieve the data required by the recently modified FCC Form 502. Rather, Centennial still manually collects and compiles the requisite numbering data for the NRUF reports, which is a time-consuming process. This manual collection process has been complicated by recent events outside of Centennial’s control. Specifically, on January 15, 2002, the North American Numbering Plan Administration (“NANPA”) implemented a Numbering Plan Area (“NPA”) Code split for the 219 NPA, and at that time, the permissive dialing period also began. The permissive dialing period for the 219 NPA split runs until at least July 29, 2002. The split of the 219 NPA into two additional NPAs (NPAs 260 and 574) especially impacts a CMRS carrier’s ability to prepare NRUF reports. Centennial must re-program its customers phones to accept the new NPAs. At this early point in the permissive dialing period, not all of Centennial’s customer’s phones have been re-programmed. Indeed, because phone re-programming can be a time-consuming process, most of Centennial’s customer’s phones have not yet been re-programmed. Since the 219 NPA split began at the same time that Centennial started collecting data to prepare its bi-annual NRUF reports, the split is impacting Centennial’s data collection process for OCN 6629, as the same numbering data is appearing for the

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<sup>3</sup> See *Order, Numbering Resource Optimization*, FCC 00-280, released July 31, 2000.

overlapping NPAs (e.g., NPAs 219/260 and NPAs 219/574). Centennial therefore must now engage in an even more time-consuming process of parsing the numbering data to avoid double-counting. Consequently, in order to avoid providing the NANPA with erroneous data, Centennial is seeking a brief extension to allow it to finish collecting, and to submit, accurate data.

Under Section 1.3 of its rules, the Commission has the discretion to waive application of any of its rules upon a showing of good cause. Federal courts also have recognized that “a waiver is appropriate only if special circumstances warrant a deviation from the general rule and such a deviation would serve the public interest.”<sup>4</sup> The Commission must therefore “take a ‘hard look’ at applications for waiver and must consider all relevant factors.”<sup>5</sup> And then, the Commission “may exercise its discretion to waive a rule where particular facts would make strict compliance inconsistent with the public interest.”<sup>6</sup>

Good cause exists for granting the requested waiver. Centennial has met the filing deadline for all of its OCNs except for OCN 6629. The delay in filing the Form 502 for OCN 6659 is the result of the recent 219 NPA split – a factor totally outside of Centennial’s control. This has led to difficulty in manually compiling the required numbering data, and it is now impossible for Centennial to compile and correctly categorize its numbering resource data for OCN 6659 by February 1. Centennial submits that this brief delay in filing will not negatively impact the Commission or any other carrier. In addition, the Commission apparently appreciates

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<sup>4</sup> *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *see also WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972).

<sup>5</sup> *Part 68 Waiver Requests of Telephone Equipment Supply, Inc., Casio Communications, Inc., Tandy Corporation, Atlinks USA, Inc., Matsushita Electric Corporation of America, Vtech Communications Limited, Cidco Incorporated, Atlinks USA, Inc., Atlinks USA, Inc.*, 2000 FCC LEXIS 2702 (May 23, 2000).

<sup>6</sup> *Northeast Cellular Telephone Co.*, 897 F.2d at 1166 (citing *WAIT Radio* 418 F.2d at 1159).

that strict compliance with the NRUF report deadline is not necessarily in the public interest, as it has granted other requests for temporary waivers of the numbering forecasting and utilization report deadlines, under similar circumstances.<sup>7</sup> Centennial had every intention of timely filing its upcoming NRUF Report, and would have done so, but for the technical difficulties that arose from the 219 NPZ split.<sup>8</sup>

Therefore, for good cause shown, Centennial respectfully requests that the Commission waive its February 1, 2002 deadline for the NRUF Report for two weeks, until February 15, 2002.

Respectfully submitted,  
**Centennial Communications Corp.**

By: /s/  
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<sup>7</sup> See, e.g., Order in CC Docket No. 99-200, *Petition of XO Communications, Inc. for Temporary Waiver of Deadline in 47 CFR § 52.12(f)(6), et al.*, DA 01-497, released February 23, 2001 (waivers granted where unanticipated software problems delayed compilation of numbering data).

8 It is also worth noting that Centennial has approximately 300 NXX codes for which it has to report numbering forecast and usage data. For a small, independent telecommunications service provider like Centennial, preparation of the requisite Form 502s is an extremely labor-intensive and time-consuming process.